

# Exhibit :

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

ABDULLAH HAYDAR,

Case No: 2:16-cv-13662

Plaintiff,

HON. LAURIE J. MICHELSON

vs.

MAG. STEPHANIE DAWKINS  
DAVIS

AMAZON CORPORATE, LLC, a  
foreign limited liability corporation;  
GARRETT GAW, an individual;  
PETER FARICY, an individual; and  
JOEL MOSBY, an individual,

Defendant.

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**DECLARATION OF ANNE DeCLEENE**

I, ANNE DeCLEENE, declare:

1. I have firsthand knowledge of the matters stated herein, and if called upon to testify as to them, I could and would do so truthfully and competently.

2. I am over eighteen years of age and competent to testify to the matters stated in this declaration.

3. I am familiar with all documents referenced in this Declaration. All referenced documents are business records of Amazon Corporate, LLC ("Amazon"), made at or near the time stated therein, by or from information transmitted by a person with knowledge of the events stated therein, and are made, kept and maintained in the ordinary course of Amazon's business.

4. The document attached to this Declaration as Exhibit 1 is a true and accurate copy of the Summary of Investigation re: Abdullah Haydar dated April 15, 2015, together with all exhibits attached thereto, which I prepared.

5. The document attached to this Declaration as Exhibit 2 is a true and accurate copy of the Summary of Investigation re: Abdullah Haydar – ADDENDUM dated April 27, 2015, which I prepared. All exhibits are attached to that report with the exception of the exhibit identified as Exhibit A, which is my initial report, and which is attached to this Declaration as Exhibit 1.

6. The document attached to this Declaration as Exhibit 3 and Bates-numbered AMAZON\_HAYDAR\_00004132 – AMAZON\_HAYDAR\_00004134 contains my email communications with Madonna Cole on May 19, 2015, wherein I

responded to Ms. Cole's request to review an email Mr. Haydar sent to Jeff Bezos on May 17, 2015, and determine whether Mr. Haydar raised any claims in addition to those I previously investigated in his May 17, 2015, email to Mr. Bezos. As indicated in my response, based on my review of Mr. Haydar's May 17, 2015, email, I determined that his email did not raise any "new" claims in addition to those I had previously investigated.

7. The document attached to this Declaration as Exhibit 4 and Bates-numbered AMAZON\_HAYDAR\_00001979 is a true and accurate copy of an email chain between me and Derek Oehler on July 8, 2015.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct.



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Anne DeCleene

Executed on this 10<sup>th</sup> day of December, 2017